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Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**STIPULATION BETWEEN DEBTORS
AND OFFICIAL COMMITTEE OF
UNSECURED CREDITORS EXTENDING
TIME TO RESPOND TO BAR DATE
MOTION**

Re: Dkt. No. 1784

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and
3 debtors in possession (collectively, the “**Debtors**”), on the one hand, and the Official Committee
4 of Unsecured Creditors (the “**Creditors Committee**”), on the other. The Debtors and the
5 Creditors Committee are referred to in this Stipulation and Agreement for Order collectively as
6 the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as follows:

7 **RECITALS**

8 A. On May 1, 2019, the Debtors filed the *Motion of Debtors Pursuant to 11 U.S.C.*
9 *§§ 502(b)(9) and 105(a), Fed. R. Bankr. P. 2002, 3003(c)(3), 5005, and 9007, and L.B.R. 3003-1*
10 *for Order (I) Establishing Deadline for Filing Proofs of Claim, (II) Establishing the Form and*
11 *Manner of Notice Thereof, and (III) Approving Procedures for Providing Notice of Bar Date and*
12 *Other Information to All Creditors and Potential Creditors* [Dkt. No. 1784] (the “**Bar Date**
13 **Motion**”), which is set for a hearing before the Court at 9:30 a.m. on June 11, 2019. Any
14 response or opposition to the Bar Date Motion is due by 4:00 p.m. (Pacific Time) on May 28,
15 2019.

16 B. Counsel for the Creditors Committee has requested, and counsel for the Debtors
17 has agreed, that the time for the Creditors Committee to respond to the Bar Date Motion be
18 extended.

19 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
20 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
21 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
22 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**
23 **THAT:**

24 1. The time for the Creditors Committee to file and serve any response or opposition
25 to the Bar Date Motion is extended through 4:00 p.m. (Pacific Time) on May 31, 2019.

26 [Signatures on next page]
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Dated: May 28, 2019

KELLER & BENVENUTTI LLP

/s/ Jane Kim

Jane Kim

*Attorneys for Debtors
and Debtors in Possession*

Dated: May 28, 2019

MILBANK LLP

/s/ Thomas R. Kreller

Thomas R. Kreller

*Attorneys for Official Committee of
Unsecured Creditors*